

U S ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Rockford Paperboard - Removal Polrep

US EPA RECORDS CENTER REGION 5



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #2
Rockford Paperboard
C550
Rockford, MI
Latitude: 43.1030374 Longitude: -85.5781170

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From: Jeffrey Kimble / Elizabeth Nightingale, OSCs

Date: 2/1/2012
Reporting Period: Week of January 29, 2012

1. Introduction

1.1 Background

Site Number:	C550	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	1/23/2012	Start Date:	1/23/2012
Demob Date:		Completion Date:	
CERCLIS ID:	MIN000510634	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

EPA has initiated a time critical removal action at the site to remove numerous containers of characteristically hazardous flammable, corrosive and other wastes. Container sizes range from 5-gallons pails to 1,000-gallon

1.1.2 Site Description

The site is comprised of a vacant paper mill building with ancillary equipment, parking areas, lawn areas and areas adjacent to the Rogue River. The site occupies an approximate area of 17.58 acres in an industrial setting. The site is bordered by Childsdales Avenue to the northwest, a wooded area to the northeast, and the Rogue River to the southeast and southwest. The site operated as paperboard/carton box production facility from 1940 until 2001. The site is now abandoned.

1.1.2.1 Location

The Rockford Paperboard Site (Site) is located at 7700 (aka 7734) Childsdales Avenue in the City of Rockford, County, Michigan, 49341. Coordinates for the site are 43.102421 degrees latitude and -85.577036 degrees longitude.

1.1.2.2 Description of Threat

The presence of hazardous substances at the site has been documented through EPA field screening and laboratory analysis. The site evaluation documented 30 small containers, 1 cylinder, 1 tote of solvent, 3 pallets of CR-8C Titanium Dioxide (Manufactured by Kerr McGee), 1 pallet Polyvinyl Alcohol, 1 tote containing a mix of Cyclohexylamine [108-91-8] and NN Diethyltoluene [100-37-8], 73 drums of unknown materials, 2 1,000-gallon tanks of unknown wastes, 10 300-gallon totes of unknown wastes, 7 bags of Polyethylene glycol 3350 granule large totes of liquid waste. There is also a chemical laboratory. Further inspection revealed additional container waste, including a large tank containing caustic material, and a polymer spill to the ground inside and outside facility.

The site building is in various states of disrepair. Holes in the roof and walls of the building allow precipitation to enter. This precipitation will lead to the further degradation of site containers and contribute to the likelihood of release. Similarly, gas service has been cut-off to the building and no heat is available. Freezing of the chemicals on site can lead to expansion and bulging of the containers and increase the likelihood of release. Lastly, the building currently sits vacant and perimeter fencing is incomplete, which can lead to trespassers. Trespassers have the potential to cause an accidental or purposeful release to the environment. The Rogue River lies less than 100

from the rear of the building

The conditions remaining at the site present substantial threat to the public health, or welfare, and the environment and meet the criteria for a time-critical removal action as provided for in the NCP, 40 C.F.R. §300.415(b)(2).

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA assessment results showed that the wastes in drums, vats, totes, tanks, compressed gas cylinders, and miscellaneous containers is hazardous. Several drum samples had a pH greater than 12.5 SUs, one drum sample was so acidic an accurate measurement was not able to be obtained, and lab-grade acids were also found to be present. Numerous drums showed labeling or indicated via field instrumentation that they hold volatile organic compounds. Two drum samples met the criteria to be considered ignitable waste (D001).

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA clean up operations will consist of properly identifying, repackaging, and shipping off site the hazardous wastes and contaminants from the site. EPA actions are focused on the containerized wastes at the site. However, several areas of the facility floor have now been documented to have removable contamination present on the floor surface. These areas will also be properly addressed to prevent exposure to pedestrian traffic and to prevent tracking of waste off site.

2.1.2 Response Actions to Date

EPA and its contractors (START and ERRS) continued the time critical removal actions this week.

On Monday January 30, 2012, the crew completed sampling of the remaining drums, small containers, and tanks. These samples will be used for hazcatting. The crew set up a room in the building for the hazcatting to occur in. The crew removed small containers from the lab and staged them in the staging area also. The waste containers were numbered, photographed and field screened. The photos will be made drum logs to track their information. The crew conducted air monitoring in the work zones for LEL, H₂S, CO and VOC. Air monitoring will be conducted daily and a record will be kept in the site log of the readings. The crew also completed cutting apart 2 empty poly tanks for disposal.

On Tuesday January 31, 2012, stone was received and the crew spread it and graded the parking area. The crew continued on dismantling of tanks. Two empty fiberglass tanks were dismantled. One poly tank in the chemical storage room (Tank 3) was <1/4 full of liquid. The top of this tank was removed. The bottom portion of the tank and its contents remain in place pending results. Another poly tank (Tank 2) in the chemical storage room was approximately 1/3 full of a white liquid material. A section of the top of this tank was removed. A sample of the liquid was collected for hazcatting purposes, and the bottom portion of the tank and its contents remain in place pending results. Air monitoring was conducted during all tank dismantling and sampling. Work is continuing on drum log forms for small containers and tanks. Approximately 30 additional small containers were found in the basement of the old boiler room and were moved to the staging area. The ERRS chemist mobilized to the site.

On Wednesday February 1, 2012, the crew began placing non-hazardous solid waste into roll off boxes for later disposal. START continues to work on drum log forms for small containers and tanks. A fume hood was mobilized to the set and set up in the compatibility testing area. The chemist began hazcatting with samples that were collected from the containers.

On Thursday February 2, 2012, additional stone was received and the crew spread it and further grad parking area. The chemist continued hazcatting work. The material in Tanks 2 and 3 was hazcatted a hazardous. The dried material will be disposed of as non- hazardous waste, and the tanks will be fully dismantled. The crew continued work to dismantle and dispose of empty containers.

On Friday, February 3, 2012, the crew continued to work on cutting empty containers and placing solid waste roll off boxes. Sweeping of facility floors was initiated in areas of historic spillage of material. 24-hour security on site for the weekend as no site work will occur.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Rockford Paperboard (former Converters Paperboard)

EPA is conducting a fund lead cleanup because they do not believe that Rockford Paperboard has assets available to conduct the cleanup on a time critical schedule

The Bridgeway Community Church has expressed interest in receiving the property after EPA completes the cleanup. The Church is planning a phase 2 assessment of the property, and has plans to demolish approximately 80% of the facility structure. The remaining building will be re-habbed into their new church home. Bridgeway Community Church has no previous liability at the site and is not a PRP. The Church also submitted a grant application to MDEQ but the grant was stopped in its final stage and the church will not receive MDEQ grant assistance for demolition activities. If the Church completes this second phase of the project, additional environmental benefits will be achieved.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

R5 Priorities Summary		
This is an Integrated River Assessment. The numbers should overlap	Miles of river systems cleaned and/or restored	1
	Cubic yards of contaminated sediments removed and/or capped	
	Gallons of oil/water recovered	
	Acres of soil/sediment cleaned up in floodplains and riverbanks	
Stand Alone Assessment	Acres Protected	17

	Number of contaminated residential yards cleaned up	0
	Human Health Exposures Avoided	357 (1/16th City pop size)
	Number of workers on site	10

2.2 Planning Section

2.2.1 Anticipated Activities

EPA will continue site work until waste disposal is complete.

2.2.1.1 Planned Response Activities

- Decontaminate facility floors as required
- Hazcat waste samples
- Submit disposal samples to laboratory
- Profile waste streams
- Recontainerize/repackage waste for off site disposal
- Demobilize from site

2.2.1.2 Next Steps

For the week of February 6, 2012, EPA will complete Hazcatting on site wastes, conduct compatability tests o wastreams, ship disposal samples to the laboratory, continue cutting/crushing empty containers, and begin ck the impacted floor areas of the facility

2.2.2 Issues

None. Site work is proceeding according to the SOW in the Action Memo

2.3 Logistics Section

The crew is operating out of 2 on site trailers (10 by 30) Temporary electric is being provided through a gener Security is on site for all non work hours and will remain for the duration of the project

The following equipment has been mobilized to the site:

Skid steer with attachmnets
40 K generator
Port-o-lets (2)
Trash dumpster (10 cubic yards)
Storage trailer
Light plant
Forklift (5000 pounds)
Rolloff boxes (2, 30 cubic yards)
SCBAs
Expendables as needed

2.4 Finance Section

2.4.1 Narrative

ERRS has been funded to \$100,000. As of February 6, 2012, 79.5 % of this budget has been expended. The project anticipates that an additional \$75,000 to \$125,000 will be needed to complete the project.

EPA is managing the technical consulting costs by having only 1 START person on site. EPA Environmental Scientist Keith Lesniak is on site to provide additional contractor oversight, and to conduct air monitoring to all START to focus on the more technical logging and tracking work.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$100,000.00	\$79,500.00	\$20,500.00	20.50%
TAT/START	\$35,000.00	\$9,400.00	\$25,600.00	73.14%
Intramural Costs				
USEPA - Direct	\$39,000.00	\$11,700.00	\$27,300.00	70.00%
USEPA - Indirect	\$27,000.00	\$8,100.00	\$18,900.00	70.00%
Total Site Costs	\$201,000.00	\$108,700.00	\$92,300.00	45.92%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Cost accounting data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

OSC Jeff Kimble is the lead for EPA. OSC Elizabeth Nightingale is working at the site as well.

Bill Poma is the RM and lead H&S person for the ERRS contractor. Mr. Poma leads the daily safety briefings beginning of each daily shift.

2.5.2 Liaison Officer

If needed, OSC will perform these tasks.

2.5.3 Information Officer

If needed, OSC will perform these tasks.

3. Participating Entities

3.1 Unified Command

None This is a fund lead removal action. There is no Unified Command. The OSC is in charge of this cleanup

3.2 Cooperating Agencies

MDEQ Nancy Johnson is the contact for the State of Michigan MDEQ may oversee the Phase 2 activities conduct a consultant for Bridgeway Community Church

4. Personnel On Site

EPA:

- OSC Jeff Kimble
- OSC Elizabeth Nightingale
- Environmental Scientist Keith Lesniak

ERRS:

- RM Bill Poma
- Forman Gary Butcher
- 2 Field Techs
- FCA Khrist Beck
- 1 Chemist (part time)

START

- Caitlin Ruza

5. Definition of Terms

SU	=	Standard units
ERRS	=	Emergency and Rapid Response Services (contract)
RM	=	Response manager
START	=	Superfund Technical Assessment and Response Team (contract)
MDEQ	=	Michigan Department of Environmental Quality
OSC	=	On Scene Coordinator
Hazcat	=	Process of determining the hazard category of wastes on site, includes field testing of material
PRP	=	Potentially responsible party
PPE	=	Personal protection equipment
RCRA	=	Resource Conservation and Recovery Act
LEL	=	lower explosive limit
O2	=	oxygen
H2S	=	hydrogen sulfide
CO	=	carbon monoxide
VOC	=	volatile organic compounds

6. Additional sources of information

NONE

6.2 Reporting Schedule

Weekly or as determined by OSC

7. Situational Reference Materials

NONE.